

**UNITED STATES DISTRICT COURT
WESTERN DISTRICT OF PENNSYLVANIA**

**BESSEMER SYSTEM
FEDERAL CREDIT UNION,**

Plaintiff,

-against-

**FISERV SOLUTIONS, LLC, *formerly*
known as FISERV SOLUTIONS, INC., and
FISERV, INC.,**

Defendants.

No. 19 Civ. 624 (MJH)

**BESSEMER SYSTEM FEDERAL CREDIT UNION’S
MOTION FOR CONSIDERATION OF SEALING**

Bessemer System Federal Credit Union (“**Bessemer**”) brings this motion for consideration of sealing pursuant to LCvR 5.2(H) in connection with certain exhibits filed in support of its concurrently filed motion for a temporary restraining order and preliminary injunction (the “**TRO/PI Motion**”).

In an abundance of caution and to avoid potentially prejudicing defendants (collectively “**Fiserv**”) by filing putatively confidential documents in the public record, Bessemer has omitted certain potentially confidential exhibits from the declaration supporting Bessemer’s TRO/PI Motion.

Bessemer does not currently take a position on whether these documents qualify for sealing. These documents, however, may implicate Fiserv’s privacy interests. As an accommodation to Fiserv, Bessemer is filing this motion to afford Fiserv an opportunity to be heard and have the Court consider this matter.

WHEREFORE, Bessemer respectfully requests that the Court consider whether to seal the documents omitted from the public record in connection with Bessemer’s TRO/PI Motion so

as to afford Fiserv has an opportunity to be heard on this matter and to show cause, if any, for why those documents qualify for sealing.

Dated: June 25, 2019

Respectfully submitted,

VEDDER PRICE P.C.

By: /s/ Charles J. Nerko

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